

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	NO. 03-CR-10356-MLW
)	
)	
FRANCIS WHITE, (3))	
a/k/a THE WHITE-HAIRED GUY)	

**GOVERNMENT'S RESPONSE TO DEFENDANT FRANCIS WHITE'S
MOTION TO MODIFY TERMS OF PRETRIAL RELEASE**

The United States of America, by and through its attorney, the United States Attorney for the District of Massachusetts, hereby submits respectfully its Response to the June 7, 2004 Motion to Modify Terms of Pretrial Release filed by Defendant Francis White ("White"). After consultation with White's Pretrial Services Officer, the government does not object to White's request that the Court modify his conditions of pretrial release to permit him to travel to New Hampshire and Maine without prior Court approval, provided that White provide advance notice to and receive advance permission from his pretrial services officer. Otherwise, the government respectfully requests that the Court leave unmodified White's remaining conditions,

including any requirement to seek and receive prior Court approval for travel to states other than New Hampshire or Maine.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Colin Owyang
ERNEST DiNISCO
COLIN OWYANG
Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I, Colin Owyang, do hereby certify that I served a copy of the foregoing pleading by first-class mail on June 15, 2004 on counsel for defendant Francis White, Richard M. Egbert, Esq. and Patricia A. DeJuneas, Esq., 99 Summer Street, Suite 1800, Boston, Massachusetts 02110

/s/ Colin Owyang
Colin Owyang
Assistant U.S. Attorney